

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

The Department of Transportation of the State of
Illinois, for and on behalf of the People of the State
of Illinois,

Petitioner,

vs.

Wisconsin Central Ltd., an Illinois Corporation; Minneapolis,
St. Paul & Sault Saint Marie Railway Company; and unknown
Owners,

Respondents.

Petition for approval of the taking or damaging of certain
properties owned by a public utility in Lake County, Illinois
by exercising the right of eminent domain. Parcel No.
1D40105TE.

T01-0072

RECEIVED
DEC 26 2001

Illinois Commerce Commission
RAIL SAFETY SECTION

ANSWER OF WISCONSIN CENTRAL LTD.

Now comes the Respondent, Wisconsin Central Ltd. ("WCL"), and, as its answer to the
Petition of the Department of Transportation of the State of Illinois ("IDOT"), states as
follows:

1. WCL lacks sufficient information that would allow it to admit or deny the
allegations contained in Paragraph One of the Petition.
2. WCL lacks sufficient information that would allow it to admit or deny the
allegations contained in Paragraph Two of the Petition.
3. WCL admits that the portion of 605 ILCS 5/4-501 quoted in the Petition is
a correct quote.
4. WCL lacks sufficient information that would allow it to admit or deny the
allegations contained in Paragraph Four of the Petition.
5. Subject to any applicable federal preemption, WCL admits the allegation
set forth in Paragraph Five of the Petition.

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6. WCL admits that it has an interest in at least half of the property described on Exhibit A to the Petition. WCL lacks sufficient information that would allow it to admit or deny the remaining allegations in Paragraph Six of the Petition.

7. WCL lacks sufficient information that would allow it to admit or deny the allegations in Paragraph Seven of the Petition.

8. WCL denies the allegations contained in Paragraph Eight of the Petition, and further alleges that Petitioner has yet to provide plans to show how its planned improvement to State Highway 83 for which it needs to acquire land interests from WCL will affect WCL's rail operations.

9. WCL admits the allegation contained in Paragraph Nine of the Petition.

10. WCL does not agree to electronic service of documents.

WHEREFORE, WCL respectfully requests the Commission:

- a. Set this matter for hearing;
- b. Deny the relief sought by the Petitioner herein; and
- c. Grant other relief that the Commission feels is just and reasonable.

Respectfully submitted,

WISCONSIN CENTRAL LTD.



Michael J. Barron, Jr.
Counsel for Wisconsin Central Ltd.
Canadian National/Illinois Central Railroad
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Chicago, IL 60611-5317
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ARDC No. 6228809

Dated: December 19th, 2001

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NOTICE OF FILING

Douglas G. Felder
Douglas G. Felder, P.C.
Special Assistant Attorney General
20 South Clark Street, Suite 2000
Chicago, IL 60603

PLEASE TAKE NOTICE that we have this 19th day of December, 2001, mailed for filing
with the Illinois Commerce Commission, Wisconsin Central Ltd.'s Answer to the Petition
of the Department of Transportation of the State of Illinois in the above-captioned
matter, a copy of which is hereby served upon you.

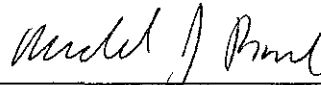
WISCONSIN CENTRAL LTD.

By Michael J. Barron, Jr.

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Bar No. 6228809

CERTIFICATE OF SERVICE

I, MICHAEL J. BARRON, JR., an attorney, certify that on behalf of Wisconsin Central Ltd., I served the foregoing Answer to the Petition of the Department of Transportation of the State of Illinois upon the Petitioner by enclosing a copy of the foregoing in an envelope addressed to the Petitioner as set forth below, postage prepaid, and depositing the envelope in the United States Mail at 455 North Cityfront Plaza Drive, Chicago, IL on the 19th day of December 2001.



Michael J. Barron, Jr.

Mr. Douglas G. Felder
Douglas G. Felder, P.C.
Special Assistant Attorney General
20 South Clark Street, Suite 2000
Chicago, IL 60603